

CP:TJS  
F.#2010R00397

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

10 CR 190 (JG)

- against -

MOHAMMED AMADU,

Defendant.

- - - - - X

GOVERNMENT'S VOIR DIRE REQUESTS

In addition to the Court's usual voir dire, the Government respectfully requests that the Court include the following questions in its examination of prospective jurors pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure.

1. Do you know any of the following individuals?
  - a. Tyler Smith, AUSA
  - b. Carolyn Pokorny, AUSA
  - c. Kyle Bowdy, ICE
  - d. William McAlpin, ICE
  - e. The defendant Mohammed Amadu
  - f. Heidi Cesare, attorney for the defendant
  - g. Marcellus Erdakos, CBP
  - h. Joseph Scerbo, CBP
  - i. Diana Sanchez, DEA
  - j. Matthew Doyle, ICE

2. Some of the evidence in this trial may come from searches performed by customs inspectors at John F. Kennedy International Airport. Do you have any feelings about such searches that would make it difficult for you to consider such evidence fairly?

3. This case is the result of an investigation by United States Customs and Border Protection, also known as "CBP," and United States Immigration and Customs Enforcement, also known as "ICE," which are both part of the Department of Homeland Security. ICE was formerly known as the Immigration and Naturalization Service, or "INS." Have you or anyone you know had any experience with CBP, ICE, the Department of Homeland Security or INS? If so, please describe the nature of that experience, and whether you considered it positive or negative.

4. In this case, the defendant is charged with narcotics offenses, including importing into the United States one kilogram or more of heroin and possessing with intent to distribute one kilogram or more of heroin. Does anyone here have any personal feelings about the drug laws now in effect in the United States that might affect your judgment of this case one way or another? If so, please explain.

5. If you answered yes to Questions 3 or 4, would this affect your ability to be fair in this case?

6. Is there anything that we may not have directly

addressed that would make it difficult for you to be a fair and impartial witness in this case?

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York

By: /s/  
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